

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Andrea M. Camarote
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association, as Trustee of the FW
Series I Trust
v.

Andrea M. Camarote
ROBERT W. SEITZER
Respondents

CASE NO.: 24-13536-amc

CHAPTER 7

Judge: Ashely M. Chan

Hearing Date: 02/05/2025 at 11:00 AM

Objection Deadline: 01/23/2025

**SUPPLEMENTAL CHAPTER 7 DECLARATION IN SUPPORT OF MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

I, Angela K. Viale, certify the following to be true under penalty of perjury:

1. I am employed as a Bankruptcy Asset Manager for SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of the FW Series I Trust (the “Movant”) and am authorized to execute this declaration on behalf of Movant. This declaration is offered in support of the Motion for Relief from the Automatic Stay annexed hereto.

2. In my capacity as Bankruptcy Asset Manager, I have access to Movant’s business records, including the business records for and relating to the loan of the Debtor, Andrea M. Camarote, secured by the real property known as 3128 Chatham St, Philadelphia, PA 19134 (the “Property”). The facts stated in this declaration are based upon information that I have obtained by reviewing records maintained in the ordinary course of business, as part of regularly conducted business activity, by or from information transmitted by person(s) with knowledge of the events described therein, at or near the time of the event described.

3. According to business records, Andrea M. Camarote executed and delivered a Note dated January 22, 2007, in favor of Prime One Mortgage, LLC (the “Original Lender”), in the

original principal amount of \$145,000.00. The Note is secured by a Mortgage executed and delivered by the Andrea M. Camarote to Original Lender.

4. The loan remains contractually due for the September 1, 2019, payment and interest continues to accrue each month that the loan remains delinquent.

5. As of January 3, 2025, the following amounts are due on the instant loan:

I. PAYOFF STATEMENT

Unpaid Principal Balance:	\$166,696.66
Accrued Interest:	\$37,283.98
Late Charges:	\$2,027.20
Attorney's Fees & Costs:	\$16,678.36
Advances for:	
Escrow Advance:	\$17,878.76
Sub-Total of Advances:	\$0.00
Less Escrow Monies:	\$0.00
Net Advances:	\$17,878.76
TOTAL DUE AS OF (January 3, 2025)	\$240,564.96

II. EQUITY ANALYSIS

Estimated Fair Market Value of Real Estate:	\$173,556.80
Source:	Debtor's Schedule D
Liens on the Real Estate:	
First Mortgage (Principal & Interest)	\$240,564.96
City of Philadelphia (per Schedule D)	\$1,258.05
TOTAL LIENS:	\$241,823.01
APPARENT EQUITY:	\$0.00

6. I certify under penalty of perjury that the foregoing is true and correct.

Executed this 21 day of January, 2025.



Signature

Angela K. Viale

Name

Bankruptcy Asset Manager

Title